

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

GEORGE D. LEVY TRUST; ESTATE OF
GEORGE D. LEVY; KAREN S. LEVY, in her
individual capacity and in her capacity as Personal
Representative of the Estate of George D. Levy;
GEORGE D. LEVY & KAREN S. LEVY
IRREVOCABLE FAMILY TRUST U/D/T
DATED 8/17/90; and DAVID ANDELMAN, in his
capacity as Trustee for the George D. Levy and
Karen S. Levy Irrevocable Family Trust U/D/T
dated 8/17/90,

Defendants.

Adv. Pro. No. 10-04721 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including December 10, 2014.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: November 21, 2014
New York, New York

By: /s/ Nicholas J. Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: November 21, 2014
New York, New York

By: /s/ LaShann M. DeArcy
MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8042
Facsimile: (212) 468-7900
Gary S. Lee
Email: glee@mofo.com
LaShann M. DeArcy
Email: ldearcy@mofo.com
Kiersten A. Fletcher
Email: KFletcher@mofo.com

*Attorneys for Defendants George D. Levy Trust,
Estate of George D. Levy, Karen S. Levy, George D.
Levy & Karen S. Levy Irrevocable Family Trust
U/T/D Dated 8/17/90, and David Andelman*

/s/ Jeffrey N. Rich

RICH MICHAELSON MAGLIFF MOSER, LLP

340 Madison Avenue, 19th Floor

New York, New York 10173

Telephone: (212) 220-9403

Facsimile: (212) 913-9641

Jeffrey N. Rich, Esq.

Email: jrich@r3mlaw.com

Mediator